

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant

-against-

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

-against-

PAULINE FELDMAN,

Defendant.

Adv. Pro. No. 10-04349 (SMB)

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

-against-

RICHARD FELDMAN,

Defendant.

Adv. Pro. No. 10-4560 (SMB)

**DISCOVERY ARBITRATOR'S DECISION AND ORDER**

Having conferred with counsel for both sides during a telephone conference on December 15, 2017, it is hereby ORDERED that:

1. The Trustee's letter-request that the Trustee's Requests to Admit addressed to defendant Pauline Feldman and Richard Feldman (together, the "Defendants") be deemed admitted is denied.
2. By January 31, 2017, the Defendants shall serve amended responses to the Trustee's Requests to Admit, which shall be based upon a reasonable inquiry by them, including a review of the documents furnished to them by the Trustee
3. The Trustee's letter request to compel the Defendants to produce documents is granted.
4. By January 31, 2017, the Defendants shall:
  - (a) engage in a good faith effort to locate all documents responsive to the Trustee's requests for the production of documents;
  - (b) produce all responsive non-privileged documents in their possession, custody or control;
  - (c) serve an amended response to the Trustee's document requests which shall not contain impermissible boilerplate objections, (see generally Mancia v. Mayflower Textile Servs. Co., 253 F.R.D. 354, 358 (D. Md. 2008)), and which specifies in response to each request whether any non-privileged documents have been withheld from production based on an objection, (see Fed. R. Civ. P. 34(b)(2)(C)).

(d) serve a privilege log for any documents withheld on privilege grounds.

5. Absent good cause shown, any documents that the Defendants have failed to produce by January 31, 2017, may not be used to support any claim or defense that the Defendants have asserted in these proceedings.
6. The Defendants shall submit their hardship application by January 31, 2017.

SO ORDERED.

Dated: New York, New York  
December 20, 2016

/s/

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FRANK MAAS  
Discovery Arbitrator

Copies to Counsel via ECF

**SERVICE LIST**

**Case Name:** In re: Bernard L. Madoff Investment Securities, LLC. et al.

**Hear Type:**

Court Reference

**Reference #:** 1425022252

**Case Type:**

Business/Commercial

**Panelist:** Maas, Frank ,

**Karin Scholz Jensen**

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**Party Represented:**

Susan Andelman

**PROOF OF SERVICE BY EMAIL & U.S. MAIL**

Re: In re: Bernard L. Madoff Investment Securities, LLC. et al.  
Reference No. 1425022252

I, Kristen Maccubbin, not a party to the within action, hereby declare that on December 20, 2016, I served the attached Decisions re: Feldmans and Andelmans on the parties in the within action by Email and by depositing true copies thereof enclosed in sealed envelopes with postage thereon fully prepaid, in the United States Mail, at New York, NEW YORK, addressed as follows:

Karin Scholz Jenson Esq.  
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Good Faith Case  
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Parties Represented:

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Estate of Carolyn Miller

Joanne Gayle

Laurie Rosen Riemer

Pauline B Feldman

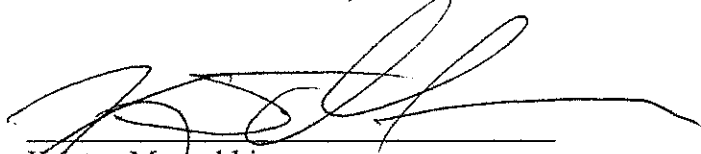
Pauline B. Feldman

Richard Feldman

Steven Andelman

Susan Andelman

I declare under penalty of perjury the foregoing to be true and correct. Executed at New York, NEW YORK on December 20, 2016.

A handwritten signature in black ink, appearing to read 'Kristen Maccubbin', written over a horizontal line.

Kristen Maccubbin  
kmaccubbin@jamsadr.com